

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SYMBOLGY INNOVATIONS, LLC

Plaintiff,

v.

VALVE CORPORATION,
GEARBOX SOFTWARE, LLC
Defendant.

Civil Action No. 2:23-cv-419-JRG-RSP

JURY TRIAL DEMANDED

FILED UNDER SEAL

**DECLARATION OF KATHLEEN R. GEYER IN SUPPORT OF
DEFENDANT VALVE CORPORATION'S MOTION TO DISMISS UNDER
FEDERAL RULE OF CIVIL PROCEDURE 12(B)(3) FOR IMPROPER VENUE**

I, Kathleen R. Geyer, hereby declare as follow:

1. I am an attorney at the law firm of Kilpatrick, Townsend, & Stockton. I am counsel for Valve Corporation ("Valve"). I am admitted to practice before this Court, and I have personal knowledge of the matters set forth herein. If called as a witness, I could and would testify competently thereto.

2. Attached as **Exhibit 1** is a true and correct copy of the Global Settlement and License Agreement, executed between Valve Corporation, Display Technologies, LLC, and Leigh Rothschild on January 11, 2016.

3. Attached as **Exhibit 2** is a true and correct copy of an executed Steam Site Licensing Program License dated September 6, 2018, bearing Bates numbers VALVE_SYM_00001206-10.

4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the Rule 30(b)(6) Deposition of Valve's corporate representative, Christopher Schenck, taken on February 5, 2024.

5. Attached as **Exhibit 4** is a true and correct copy of an agreement between Valve and [REDACTED], bearing Bates numbers

VALVE_SYM_00001345-54.

6. Attached as **Exhibit 5** is a true and correct copy of an [REDACTED]

[REDACTED] bearing Bates numbers VALVE_SYM_00001267-78.

7. Attached as **Exhibit 6** is a true and correct copy of an agreement between Valve and [REDACTED], bearing Bates numbers

VALVE_SYM_00001301-44.

8. Attached as **Exhibit 7** is a true and correct copy of an agreement between Valve and [REDACTED], bearing Bates numbers

VALVE_SYM_00001240-66.

9. Attached as **Exhibit 8** is a true and correct copy of an agreement between Valve and [REDACTED], bearing Bates numbers

VALVE_SYM_00001284-96.

10. Attached as **Exhibit 9** is a true and correct copy of Valve's Responses and Objections to Plaintiff's Venue Interrogatories, served on January 22, 2024.

11. Attached as **Exhibit 10** is a true and correct copy of an agreement between Valve and [REDACTED] bearing Bates numbers VALVE_SYM_00001220-27.

12. Attached as **Exhibit 11** is a true and correct copy of the [REDACTED]

[REDACTED],
bearing Bates numbers VALVE_SYM_00001122-37

13. Attached as **Exhibit 12** is a true and accurate depiction of the web page <https://partner.steamgames.com/doc/sdk>, captured on April 5, 2024.

14. Attached as **Exhibit 13** is a true and correct copy of the Termination of Product Development Agreement between Valve, L.L.C. and Gearbox Software, L.L.C. terminating the Product Development Agreement dated August 21, 2001, bearing Bates numbers VALVE_SYM_00001178-88.

15. Attached as **Exhibit 14** is a true and accurate depiction of the web page https://store.steampowered.com/app/1286680/Tiny_Tinas_Wonderlands/, captured on April 5, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 8, 2024

/s/ Kathleen R. Geyer

Kathleen R. Geyer